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## Department of Energy

Richland Operations Office

P.O. Box 550

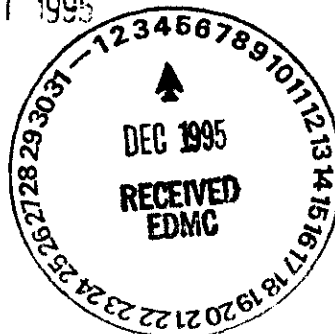
Richland, Washington 99352

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NOV 21 1995

Mr. Steve M. Alexander  
Perimeter Areas Section Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 W. Fourth Avenue  
Kennewick, Washington 99336-6018



Dear Mr. Alexander:

### PROPOSAL TO MANAGE CONTAMINATED MEDIA FROM THE 300 AREA PROCESS TRENCHES (APT)

- References: (1) RL ltr. to S. M. Alexander from J. E. Rasmussen and W. T. Dixon, subject as above, dtd. March 14, 1995
- (2) Ecology ltr. to J. E. Rasmussen from S. M. Alexander "Conditional Contained-In Determination for the 300 Area Process Trenches," dtd. May 15, 1995
- (3) Dangerous Waste Permit Application for the 300 Area Process Trenches, Part A, Form 3, Revision 4, certified by J. F. Nemec, BHI, on April 28, 1995, and J. D. Wagoner, RL, on May 25, 1995

This letter provides a summary of the issue and a proposal from the U.S. Department of Energy, Richland Operations Office (RL), for addressing a regulatory concern related to the management of contaminated media from the 300 APT.

On March 14, 1995, RL requested a contained-in determination (Reference 1) from the State of Washington, Department of Ecology (Ecology), for listed waste codes F001, F002, F003, F004, and F005 present in the stockpile of the 300 APT. Ecology responded to this request by issuing a conditional contained-in determination for listed waste codes F001, F002, F003, F004, and F005 (Reference 2). The conditional contained-in determination was granted contingent upon removal of the 300 APT stockpile to an onsite landfill that meets the minimum technical requirements of 40 CFR Part 264 of the "Resource Conservation and Recovery Act of 1976" (e.g., the Environmental Restoration Disposal Facility [ERDF] or W-025). When the stockpile is removed and disposed to ERDF or W-025, the listed waste codes will no longer apply.

After the contained-in determination for the 300 APT was issued by Ecology, an additional listed waste code was added to the existing Part A, Form 3, Permit Application. This listed waste code, U210, was added based on information that tetrachloroethylene was discharged to the 300 APT in the form of a discarded chemical. The revised Part A, Form 3, Permit Application for the 300 APT was signed by RL and Bechtel Hanford, Inc., and transmitted to Ecology (Reference 3). No comments were provided to RL from Ecology regarding transmittal of the 300 APT Part A, Form 3, Permit Application.

Mr. Alexander

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Because all data regarding tetrachloroethylene has been reviewed previously by Ecology in the original contained-in request and such request has been granted with stipulations for contingent management, RL is requesting that the listed waste code U210 be included in the existing conditional contained-in determination for the 300 APT.

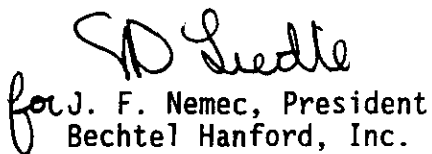
If you have any questions, please contact Mr. R. G. McLeod at 372-0096.

Sincerely,



James E. Rasmussen, Director  
Environmental Assurance, Permits,  
and Policy Division

RAP:RGM



for J. F. Nemec, President  
Bechtel Hanford, Inc.

cc: R. Buck, Wanapum  
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